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October 11, 2011

City of Libby Attn: Robin Benson, Council Member 952 E. Spruce Street Libby, Montana 59923

SUBJECT: Riverfront Park Asbestos Removal

Dear Libby City Council Members:

At the September 21, 2011 Lincoln Conservation District Board of Supervisors Meeting, Mike Cirian, Environmental Protection Agency (EPA), informed the LCD Supervisors of the proposed asbestos remediation work along the south bank of the Kootenai River between the pump station and the Highway 37 bridge. Mr. D.C. Orr and Ms. Robin Benson from the Libby City Council were also present at this meeting. The LCD Supervisors informed Mr. Cirian because this site is within the city limits of Libby, the project is outside of our authority, however, the LCD would be willing to inspect the site and give our insight and recommendations to the Libby City Council and the EPA. Mr. Cirian and the attending City Council members agreed this would be useful.

On September 30th, LCD Board Members Don Crawford, Mark Romey, Steve Johnson and Wayne Maahs met with Mr. Circan at the project site and reviewed the various actions that might take place. After the inspection was completed, the attending LCD Board members agreed to the following recommendations for the Libby City Council and the EPA:

- 1. While adhering to the requirements of City of Libby and the State of Montana, the LCD would recommend maintaining as much of the existing large woody vegetation on the project area as possible.
- 2. If any cottonwood trees are cut down, we recommend leaving the stump and roots in place so they can sprout for future vegetation on the site. When rip-rap is placed, make certain the stump and roots are integrated into the placement.
- 3. On the two eroded areas that currently do not have woody vegetation, we would recommend placing rip-rap on the lower part of the bank and planting native woody vegetation on the upper portion. This re-vegetation would require watering for a number of years to get it established. The LCD believes the best long term solution to river bank stabilization is to vegetate the site.

Thank you for the opportunity to provide input on this project and if you have any questions about our comment please contact us at (406) 297-2233.

Sincerely, Lincoln Conservation District

Susan Ennenbach Chairperson Lincoln Conservation District

SE/bl

cc: Mike Cirian, EPA
Mike Hensler, Mt. Fish, Wildlife & Parks